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January 13, 2020

The Honorable Edgardo Ramos
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *State of New York v. Pennsylvania Higher Educ. Assistance Agency*, No. 19-cv-9155 (ER)

Dear Judge Ramos:

Plaintiff the New York Office of the Attorney General ("NYAG") writes to respond to defendant Pennsylvania Higher Education Assistance Agency ("PHEAA")'s January 13, 2020 letter (Docket No. 32) requesting leave to file a motion requesting leave to file up to a 50-page memorandum (double that permitted by the Court's Individual Practice Rule 2(B)(i)) in support of PHEAA's forthcoming motion to dismiss.

NYAG will consent to a 35-page limit for opening briefs (for both PHEAA and NYAG) on PHEAA's motion to dismiss, but opposes PHEAA's request for fifty pages. Doubling the Court's typical page limitation is unwarranted. Neither NYAG's complaint nor PHEAA's forthcoming motion raise an atypical number of claims or arguments, nor are PHEAA's arguments, some of which have already been rejected by other courts, extraordinary in their complexity. Accordingly, doubling the page limitation is unnecessary.

Respectfully submitted,

/s/ Carolyn Fast

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